

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Profectus Technology LLC,

Plaintiff,

v.

Huawei Technologies Co., Ltd. *et al.*,

Defendants.

Case No. 6:11-cv-00474-LED
(Consolidated – Lead Case)

Jury Trial Demanded

JOINT MOTION TO DISMISS WITH PREJUDICE

All claims and counterclaims asserted in this action by and between plaintiff Profectus Technology LLC and defendant Parrot, Inc. have been settled and, pursuant to Fed. R. Civ. P. 41(a)(2), those parties hereby jointly move the Court to dismiss those claims and counterclaims with prejudice and with each party to bear its own costs, expenses, and attorneys' fees. This stipulated dismissal with prejudice is pursuant to plaintiff Profectus Technology LLC and defendant Parrot, Inc.'s settlement agreement entered in December of 2012.

Dated: January 8, 2013.

Respectfully submitted,

/s/ Steven E. Ross

Steven E. Ross
Lead Attorney
Texas State Bar No. 17305500
sross@rossipg.com

Samuel E. Joyner
Texas Bar No. 24036865
sjoyner@rossipg.com
ROSS JOYNER PLLC
1700 Pacific Ave., Suite 3750
Dallas, Texas 75201
Phone: 972-661-9400
Facsimile: 972-661-9401

/s/ William B. Nash

William B. Nash
Lead Attorney
Texas State Bar No. 14812200
bill.nash@haynesboone.com
HAYNES AND BOONE, LLP
112 E. Pecan Street, Suite 1200
San Antonio, Texas 78205
Phone: 210-978-7000
Facsimile: 210-978-7450

**ATTORNEYS FOR DEFENDANT
PARROT, INC.**

Wesley Hill
Texas State Bar No. 24032294
wh@wsfirm.com
WARD & SMITH LAW FIRM
1127 Judson Road, Suite 220
Longview, Texas 75606-1231
Phone: 903-757-6400

**ATTORNEYS FOR PLAINTIFF
PROFECTUS TECHNOLOGY LLC**

CERTIFICATE OF SERVICE

In accordance with Federal Rule of Civil Procedure 5 and Local Rule CV-5(a), I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system on January 8, 2013.

/s/ Steven E. Ross

Steven E. Ross